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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

Bankruptcy Case No. 19-30088 (DM)

PG&E CORPORATION,

Chapter 11

- and -

(Lead Case) (Jointly Administered)

**PACIFIC GAS AND ELECTRIC
COMPANY,**

**REORGANIZED DEBTORS' REPORT ON
RESPONSE TO FIFTH SECURITIES
CLAIMS OMNIBUS OBJECTION (NO LOSS
CAUSATION – SECURITIES SOLD PRIOR
TO THE FIRST PURPORTED
“CORRECTIVE DISCLOSURE”) AND
REQUEST FOR ORDER BY DEFAULT**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

[Re: Dkt. No. 10665]

** All papers shall be filed in the Lead Case, No.
19-30088 (DM).*

**Resolving Objection Set for Hearing
June 30, 2021 at 10:00 a.m. (Pacific Time)**

REQUEST FOR ENTRY OF ORDER BY DEFAULT

PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as debtors and reorganized debtors (collectively, the “**Debtors**” or the “**Reorganized Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”) hereby request, pursuant to Rule 9014-1(b)(4) of the Bankruptcy Local Rules for the United States District Court for the Northern District of California, as made applicable to these Chapter 11 Cases by the *Second Amended Order Implementing Certain Notice and Case Management Procedures*, entered on May 14, 2019 [Docket No. 1996] (the “**Case Management Order**”), that the Court enter an order by default on the *Reorganized Debtors’ Fifth Securities Claims Omnibus Objection (No Loss Causation – Securities Sold Prior to the First Purported “Corrective Disclosure”)* [Docket No. 10665] (the “**Fifth Securities Claims Omnibus Objection**”).

RELIEF REQUESTED IN THE FIFTH SECURITIES CLAIMS OMNIBUS OBJECTION

The Fifth Securities Claims Omnibus Objection seeks to disallow and expunge proofs of claim listed in Exhibit 1 to the Fifth Securities Claims Omnibus Objection, on the grounds that the holders of those claims sold all of their positions prior to the release of any purported “corrective disclosure.”

NOTICE AND SERVICE

The Reorganized Debtors filed the *Notice of Hearing on Reorganized Debtors’ Fifth Securities Claims Omnibus Objection (No Loss Causation – Securities Sold Prior to the First Purported “Corrective Disclosure”)* [Docket No. 10667] (the “**Notice of Hearing**”). The Fifth Securities Claims Omnibus Objection was also supported by the *Declaration of Edward J. Radetich, Jr. in Support of Reorganized Debtors’ Fifth Securities Claims Omnibus Objection (No Loss Causation – Securities Sold Prior to the First Purported “Corrective Disclosure”)* [Docket No. 10666] (the “**Declaration**”). The Fifth Securities Claims Omnibus Objection, the Notice of Hearing, and the Declaration were served as described in the *Certificate of Service* of Victor Wong, filed on May 24, 2021 [Docket No. 10709] (the “**Certificate of Service**”). As further described in the Certificate of Service, on May 19, 2021, each holder of a claim listed on Exhibit 1 to the Fifth Securities Claims Omnibus Objection received a notice customized to include the claim number, debtor, claim amount and priority, and the grounds for the Fifth Securities Claims Omnibus Objection.

1 The deadline to file responses or oppositions to the Fifth Securities Claims Omnibus Objection
2 has passed. The Reorganized Debtors have not received any formal or informal responses.

3 **DECLARATION OF NO OPPOSITION RECEIVED**

4 The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury that:

5 1. I am a partner with the law firm of Weil, Gotshal & Manges LLP (“**Weil**”), counsel for
6 the Reorganized Debtors.

7 2. The Court’s docket in the Chapter 11 Cases has been reviewed and Weil has determined
8 that no responses have been filed with respect to the Fifth Securities Claims Omnibus Objection.

9
10 WHEREFORE, the Reorganized Debtors hereby request entry of an order disallowing and
11 expunging the proofs of claim listed in the column headed “Claims to be Disallowed/Expunged” in
12 **Exhibit A** to this Request, which listed claims identical to those in Exhibit 1 to the Fifth Securities
13 Claims Omnibus Objection.

14 Executed on June 23, 2021 in New York, NY.

15 **WEIL, GOTSHAL & MANGES LLP**

16 **KELLER BENVENUTTI KIM LLP**

17 By: /s/ Richard W. Slack

18 Richard W. Slack

19 *Attorneys for Debtors and Reorganized Debtors*
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